

**SPILL PREVENTION, CONTROL
& COUNTERMEASURE PLAN**

**United Oil Recycling Services
Middletown, Ohio**

Prepared for:

**United Wastewater Services
11807 Reading Road
Cincinnati, Ohio 45241**

Prepared by:

**PSARA Technologies, Inc.
10925 Reed Hartman Highway
Suite 220
Cincinnati, Ohio 45242**

February 2009
PN 30433.37

PLAN CERTIFICATION

United Oil Recycling Services, Middletown, Ohio

Engineer's Certification

Being familiar with this facility as of June 4, 2008, I hereby certify that I am familiar with the requirements of 40 CFR Part 112; that I (or my agent) have visited and examined the facility; that this SPCC Plan has been prepared in accordance with good engineering practice, including consideration of applicable industry standards, and with the requirements of the SPCC rule; that procedures for required inspections and testing have been established; and that the Plan is adequate for the facility.

J. C. Albertz
James C. Albertz, PE

2-18-09
Date



#E-53228
State Registration No.

Ohio
State

SEAL

Management's Commitment of Resources

United Oil Recycling Services is committed to the implementation of the procedures outlined in the SPCC Plan and the prevention of releases of oil to navigable waters of the United States. This Plan has the full approval of management at a level of authority to commit the resources necessary to implement the Plan. A complete copy of this Plan shall be maintained at the facility at all times and will be made available to the EPA Regional Administrator or State of Ohio for onsite review during normal working hours.

David C. Brown
David Brown
President

2-18-09
Date

PLAN REVIEW AND AMENDMENT

United Oil Recycling Services, Middletown, Ohio

Five-Year Plan Review

I have completed a review and evaluation of the SPCC Plan for this facility and will/will not amend the Plan as a result.

Review Date	Plan Amendment		Signature of Person Authorized to Review This Plan
	Will Amend	Will Not Amend	
	<input type="checkbox"/>	<input type="checkbox"/>	
	<input type="checkbox"/>	<input type="checkbox"/>	

Technical Amendments

→ entering a contract w/ Payne Firm to Modify SPCC Plan as of 2/25/11 D. J. [Signature] 3/1/11

Any technical amendments to this Plan will be re-certified by a licensed Professional Engineer.

Review Date	Description of Amendment	Signature of Person Authorized to Certify This Amendment

January 26, 2011

Client:

United Waste Water Services
11807 Reading Road
Cincinnati, OH 45241

Attn: David Weber

Work Order: DUA0728
Project Name: 2011 Analysis
Project Number: UORS Tank Bottom Sludge 11678

Date Received: 01/19/11

Samples logged in at Dayton laboratory.

An executed copy of the Chain of Custody is also included as an addendum to this report.

If you have any questions relating to this analytical report, please contact your Laboratory Project Manager at the number shown above.

SAMPLE IDENTIFICATION	LAB NUMBER	COLLECTION DATE AND TIME
UORS Tank Bottom Sludge 11678	DUA0728-01	01/10/11 09:30

Ohio Certification Number: 4074, 857

Reproduction of this analytical report is permitted only in its entirety. This report shall not be reproduced except in full without the written approval of the laboratory.

TestAmerica Laboratories, Inc. certifies that the analytical results contained herein apply only to the samples tested as received by our Laboratory.

Report Approved By:



This report has been electronically signed.

TestAmerica Dayton

Deborah Olszowka
Dayton Senior Project Manager

United Waste Water Services
11807 Reading Road
Cincinnati, OH 45241
David Weber

Work Order: DUA0728
Project: 2011 Analysis
Project Number: UORS Tank Bottom Sludge 11678

Received: 01/19/11
Reported: 01/26/11 13:37

ANALYTICAL REPORT

Analyte	Sample Result	Data Qualifiers	Units	RL	Dilution Factor	Date Analyzed	Analyst	Seq/ Batch	Method
Sample ID: DUA0728-01 (UORS Tank Bottom Sludge 11678 - Non-aqueous)					Sampled: 01/10/11 09:30		Recvd: 01/19/11 16:10		
TCLP Metals by 1311/6000/7000									
Arsenic	<0.500		mg/L	0.500	1	01/21/11 17:48	MJW	11A0713	SW 6010B
Barium	0.914		mg/L	0.100	1	01/21/11 17:48	MJW	11A0713	SW 6010B
Cadmium	<0.150		mg/L	0.150	1	01/21/11 17:48	MJW	11A0713	SW 6010B
Chromium	<0.200		mg/L	0.200	1	01/21/11 17:48	MJW	11A0713	SW 6010B
Lead	<0.400		mg/L	0.400	1	01/21/11 17:48	MJW	11A0713	SW 6010B
Mercury	<0.00100		mg/L	0.00100	1	01/21/11 15:15	CAJ	11A0715	SW 7470A
Selenium	<0.500		mg/L	0.500	1	01/21/11 17:48	MJW	11A0713	SW 6010B
Silver	<0.200		mg/L	0.200	1	01/21/11 17:48	MJW	11A0713	SW 6010B

United Waste Water Services
11807 Reading Road
Cincinnati, OH 45241
David Weber

Work Order: DUA0728
Project: 2011 Analysis
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Reported: 01/26/11 13:37

CERTIFICATION SUMMARY

Any abnormalities or departures from sample acceptance policy shall be documented on the Chain of Custody and/or Case Narrative included with this report.

For information concerning certifications of this facility or another TestAmerica facility, please visit our website at www.TestAmericaInc.com

Samples collected by TestAmerica Field Services personnel are noted on the Chain of Custody (COC) .

ADDITIONAL COMMENTS

Results are reported on a wet weight basis unless otherwise noted in the units.

ANALYSIS LOCATIONS

Any analyses listed below were analyzed in satellite facilities

TestAmerica

THE LEADER IN ENVIRONMENTAL TESTING

Cooler/Sample Receipt

☐ MSDS or Known Hazard Information Supplied by Client
☐ Bottle stickers applied ☐ ELEMENT comment entered ☐ MSDS/COC scanned/emailed to EHSS

☐ Discrepancies Client ID United Way

☐ Short Hold Work Order # 00140718

☐ Rush ☐ 24hr ☐ 2day ☐ 3day ☐ 5day ☐ Other

Receipt evaluation performed by - Initials JS Date 1/19/11 Time: 1:10

Method of Shipment:

- ☐ Walk-In Client ☒ TestAmerica Field/Courier
- ☐ Other Client/3rd Party Courier
- ☐ Fed Ex Tracking # _____
- ☐ UPS Tracking # _____
- ☐ Other _____

Shipping Container Type:

- ☒ Cooler ☐ Box
- ☐ None ☐ Other _____

Custody Seals Intact:

- ☒ Yes ☐ No
- ☐ N/A (not used or required)

Packing Materials:

- ☒ Plastic Bags ☐ Foam
- ☒ Bubble Wrap ☐ Paper
- ☐ Packing Peanuts ☐ None
- ☐ Other _____

Cooling Materials:

- ☒ Ice (solid) ☐ Ice (Melted)
- ☐ Blue Ice ☐ None
- ☐ Other _____

Are there any soil samples from areas requiring USDA quarantine? (AL, AR, AZ, CA, FL, GA, HI, ID, LA, MS, NC, NM, NY, OK, SC, TN, TX, VA, Puerto Rico, Virgin Islands, any other Non-Domestic area)

☒ No ☐ Yes (if Yes, Project Manager must be notified).

Receipt Temperatures

Thermometer ID	Observed (°C)	Corrected (°C)	Temp Blank	Sample Temp	Received on same day samples?	Acceptable?*	Cooler ID	Note Affected Samples if temperature not acceptable
<u>6</u>	<u>2.6</u>	<u>2.7</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No		
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No		

* Receipt temperatures are considered acceptable if the samples are received on the same day they were collected & show signs that the cooling process has started. Temperature acceptance for most tests is ≤6.0°C, but not frozen. For additional information, please refer to SOP DT-SCA-004 Sample Receipt and Login, Attachment 2 - Holding Times, Preservation and Container Requirements.

Receipt Questions**	Y	N	n/a	"No" answers require additional comment
COC present & TA receipt signature, date, & time properly documented?	<input checked="" type="checkbox"/>			
Containers & labels in good condition? (unbroken, not leaking, appropriately filed, labels legible & attached)	<input checked="" type="checkbox"/>			
Appropriate containers used & adequate volume provided?	<input checked="" type="checkbox"/>			
Number of sample containers match COC?	<input checked="" type="checkbox"/>			
Samples received within hold time?	<input checked="" type="checkbox"/>			
Samples submitted for GRO and Volatiles analyses (8260, 624, 524) received without headspace?	<input checked="" type="checkbox"/>			
Was a Trip Blank received with VOA samples?			<input checked="" type="checkbox"/>	
Were the samples free of any questionable physical conformities? For example, field duplicates or multiple bottles of the same sample do not significantly vary in appearance (color, proportion of solids, etc.)	<input checked="" type="checkbox"/>			
Were the COC, bottle labels, and all other items free of all other discrepancies or issues that would need to be addressed with the Project Manager and/or Client?	<input checked="" type="checkbox"/>			

** May not be applicable if samples are not for compliance testing

Client Contact Record

Contact via: ☐ Phone ☐ Email ☐ Other _____ Person Contacted: _____ Date/Time: _____

☐ Discrepancy allowance agreement is on record in the client project file.

Discussion/Resolution: _____

Any additional documentation and clarification from client must be noted in the narrative and/or scanned into the COC directory.

TM

1/20/11

10/1

TM No. DT-SCA-004 Rev 0

Sampling for United Oil Recovery, Middletown, Ohio

This facility is an oil recovery operation. Water is separated from the oil and is discharged to the city sewer system. Oil is shipped off-site as fuel or for re-refining. Our sampling will be to determine if the facility is receiving and putting into commerce PCB contaminated oils or discharging PCB contaminated waste water to the city sewer system.

We plan to collect the following samples for PCB analyses:

(these numbers are maximum)

3 oil samples

3 water samples

4 wipe samples

Because the TSCA requires that we offer split samples will require double the amount of bottles, plus add in blanks. Therefore I would like to have available the following:

⑨ 8 1L amber glass bottles (for PCBs in water)

② 8 8.0 oz. glass jars (for PCBs in oil)

10 4.0 oz. glass jars (for PCB wipe samples)

Our current planned sampling date is May 24, 2011.

Prep by Friday

Det
Det

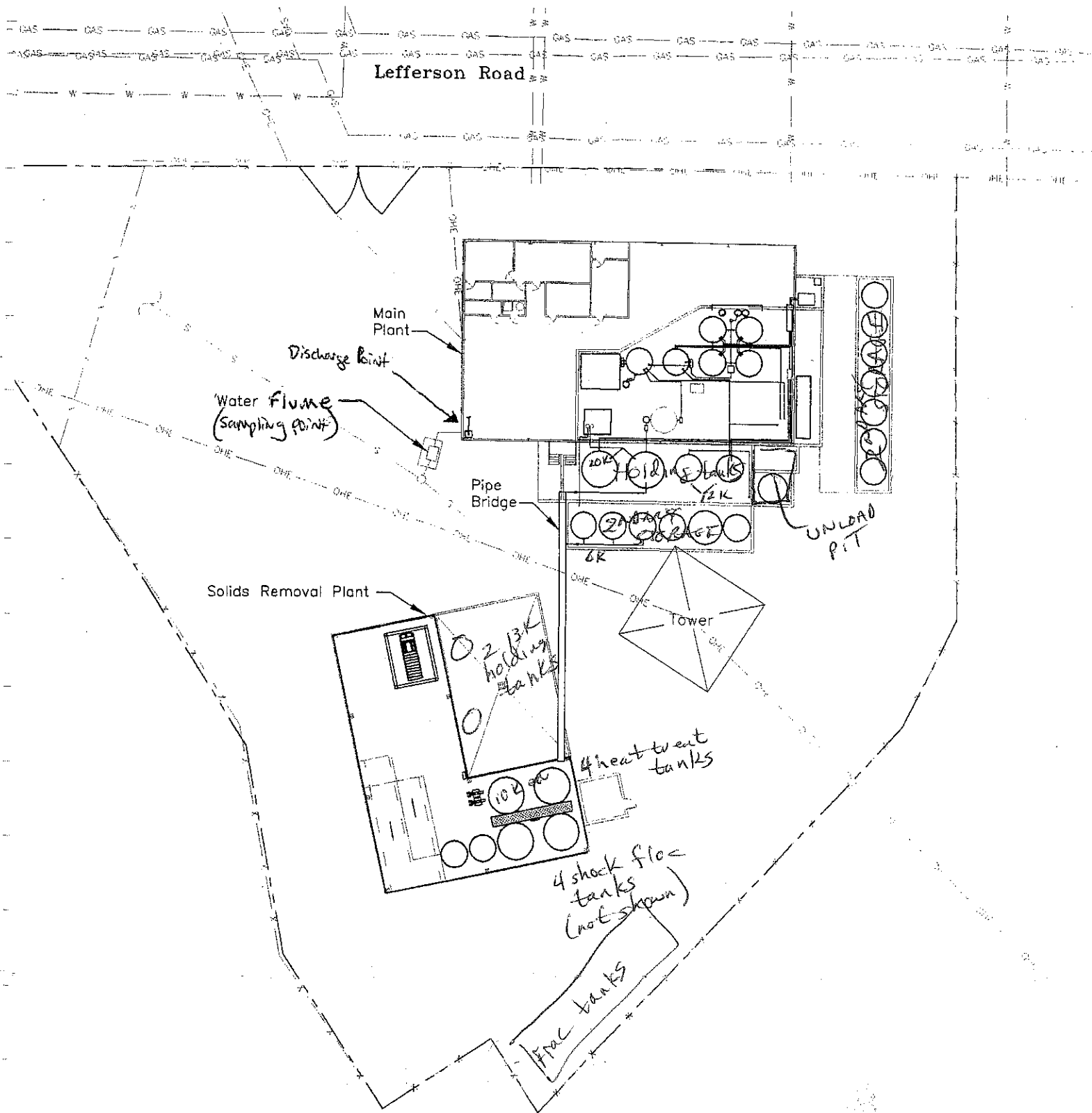
ENVIRONMENTAL PROTECTION AGENCY
Office of Enforcement

REGION 5
77 West Jackson Boulevard
Chicago, Illinois 60604

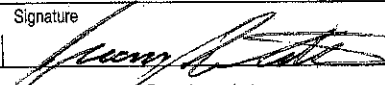
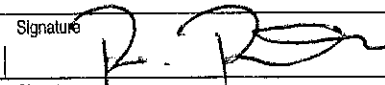
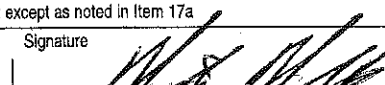
CHAIN OF CUSTODY RECORD

[illegible]

39700



LEGEND

NON-HAZARDOUS WASTE MANIFEST		1. Generator ID Number		2. Page 1 of		3. Emergency Response Phone		4. Waste Tracking Number	
		5. Generator's Name and Mailing Address United Solutions 401 Industrial Dr. Franklin, OH. 45005		Generator's Site Address (if different than mailing address)					
Generator's Phone:		6. Transporter 1 Company Name United Waste Water Services		513-733-4666		U.S. EPA ID Number OHO000107649			
7. Transporter 2 Company Name						U.S. EPA ID Number			
8. Designated Facility Name and Site Address United Waste Water 2640 Lefferson Rd Middletown, OH. 45044				513-733-4666		U.S. EPA ID Number			
Facility's Phone:									
9. Waste Shipping Name and Description		10. Containers		11. Total Quantity		12. Unit Wt./Vol.			
		No.	Type						
1. Non-haz Oily water		001	TT	5000	gals				
2. Non-Haz Soap									
3.									
4.									
13. Special Handling Instructions and Additional Information <div style="text-align: center; font-size: 2em;">"TANK 6"</div>									
14. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and governmental regulations.									
Generator's/Offoror's Printed/Typed Name JOSEPH WATTS		Signature 		Month 05		Day 24		Year 11	
15. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S.		Port of entry/exit:		Date leaving U.S.:					
16. Transporter Acknowledgment of Receipt of Materials									
Transporter 1 Printed/Typed Name Raphael Peterson		Signature 		Month 5		Day 24		Year 11	
Transporter 2 Printed/Typed Name		Signature		Month		Day		Year	
17. Discrepancy									
17a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection									
Manifest Reference Number:									
17b. Alternate Facility (or Generator) U.S. EPA ID Number									
Facility's Phone:									
17c. Signature of Alternate Facility (or Generator) Month Day Year									
18. Designated Facility Owner or Operator: Certification of receipt of materials covered by the manifest except as noted in Item 17a									
Printed/Typed Name Mike Mueg		Signature 		Month 05		Day 24		Year 11	



TECHNICAL SOLUTIONS
NORTH AMERICA

OK

May 20, 2011

Client:

United Resource Management
401 Industrial Drive
Franklin, Ohio 45005

Project Name: PCB's
Method Number: SW846-8062

SAMPLE IDENTIFICATION	LAB NUMBER	COLLECTION DATE AND TIME
Task 6	154059	05-20-11 7:00

Sample	Sample	Units	Report	Dilution	Date	Analyst
Number	Location		Level	Factor	Analysed	
PCB-1016	ND	ppm	2	100	05-20-11	AW
PCB-1221	ND	ppm	2	100	05-20-11	AW
PCB-1232	ND	ppm	2	100	05-20-11	AW
PCB-1242	ND	ppm	2	100	05-20-11	AW
PCB-1248	ND	ppm	2	100	05-20-11	AW
PCB-1254	ND	ppm	2	100	05-20-11	AW
PCB-1260	ND	ppm	2	100	05-20-11	AW

DATA QUALIFIERS AND DEFINITIONS

ND Non-Detect

Certification: Except as noted, all analytical data reported above was obtained under my direction and supervision. Preparation and analytical methods are required by Veolia's Waste Analysis Plan. This laboratory follows a quality assurance control plan.

Report Approved By:

Angela Rina 5/20/11

Veolia Technical Solutions, LLC
10000 North Central Expressway, Suite 100, OH 45424
www.veoliaes.com



UNITED
A USI Company

Collection and Sales • Non-Regulated Liquids Transportation/Disposal

Container Management/Leasing

Regulated Liquids Transportation/Disposal

An Employee Owned Company

Services

United processes and recycles a full range of non-hazardous industrial and other wastes. They include waste water, ink and paint, washwater, sludges, high-metal content waste streams and used oils. We recycle more than 500,000 gallons of used oil each month by marketing it to re-refiners and burners. The company operates a state of the art pre-treatment facility that uses a wide variety of technologies to handle the range of materials processed. They include ultra-filtration, carbon absorption, chemical treatment, metals flocculation, filter press, centrifuge and solidification treatments. United has compiled an outstanding environmental compliance record both with the Ohio EPA and with the Cincinnati Metropolitan Sewer District (MSD), which regulates water discharged into sewer systems.



UNITED
A USI Company

Oil Collection and Sales Non-Regulated Liquids Transportation/Disposal

Container Management Drums and Tanks Management

An Employee Owned Company

Types of Oils

- Crank case oils
- Hydraulic oils
- cutting oils
- Synthetic oils
- Machining oils
- Gear Oils
- Quench Oils